



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

September 26, 2011

Alexcy Romero, Superintendant
National Capitol Parks-East
1900 Anacostia Drive, SE
Washington D. C. 20020

RE: Wetlands and Resident Canada Geese Management Plan/ Draft Environmental Impact Statement, Anacostia Park, June 2011 CEQ # 20110238

Dear Superintendent Romero:

In accordance with the National Environmental Policy Act (NEPA) of 1969, and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) has reviewed the Wetland and Resident Canada Geese Management Plan Draft Environmental Impact Statement (DEIS), Anacostia Park. The park occupies 1,300 acres along 5 miles of the Anacostia River shoreline within Washington D.C. and Maryland. According to the DEIS, the purpose of this plan is to guide and direct the actions of the NPS in the management of wetlands and resident Canada geese at Anacostia Park. Currently, some restored wetlands at the park are being damaged by grazing resident Canada geese resulting in: adverse change to the emergent vegetation and submerged aquatic vegetation structure and composition; erosion and sedimentation problems in the Anacostia River that have negatively impacted the water quality in the river; and potential adverse effects on wildlife and fisheries habitat and the natural distribution, abundance, and diversity of native plant species. A population goal of 54 geese has been established for Anacostia Park.

According to the DEIS, the alternatives evaluated in this document rely on adaptive management to guide the implementation of the preferred alternative. This document is a general plan for the management of wetlands and resident geese within the park and evaluates the impacts at a programmatic level. Additional NEPA analysis may be required for some future management projects prior to construction or implementation of these projects. Should the evaluation of monitoring data indicate the need for action, NPS will select a management option from those available within the preferred alternative that best responds to the conditions documented by monitoring. The Alternatives evaluated in the DEIS include:

- Alternative A (No action)

-Alternative B (Preferred Alternative) - provides the highest level of wetlands and goose management. Also considers new wetland restoration options (lethal and non lethal controls).



-Alternative C - includes moderate wetlands management with moderate goose management. This alternative assumes that more intensive wetland management would be needed to counteract the resident goose population that would remain in the area.

-Alternative D - low wetlands management and low goose management. Lethal goose management only one time during the plan and only as a last resort.

-Alternative E - most aggressive wetlands management techniques with intensive non-lethal goose management. This alternative would consider new wetland restoration options as well.

Based on our review, this DEIS is rated "LO" (Lack of Objections). A description of our rating system can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

EPA recommends avoiding and minimizing impacts to existing wetlands. If impacts to aquatic resources are to occur the proper permits must be obtained. We look forward to working with you as the project continues to move forward through any additional potential NEPA and Clean Water Act Section 404 permit process.

Thank you for the opportunity to offer these comments. If you have any questions, please contact Ms. Barbara Okorn at (215) 814-3330.

Sincerely,



Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

